

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION SUBMITTING EXHIBITS TO THE NOTICE OF CORRESPONDENCE
REGARDING THE NINETY-FOURTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO
HIGHWAYS AND TRANSPORTATION AUTHORITY, AND EMPLOYEES
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO TO INDIVIDUAL PROOFS OF CLAIM NOS. 161340, 12995, 14790,
AND 53781 [ECF NO. 15090]**

To the Honorable United States District Judge Laura Taylor Swain:

1. On October 24, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed the *Ninety-Fourth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 8983] (the “Ninety-Fourth Omnibus Objection”) to various proofs of claim.

2. The Ninety-Fourth Omnibus Objection seeks to disallow certain deficient claims which purport to assert liabilities arising from salary or other compensation owed in connection with employment, pensions, or services provided by the claimant, but fail to provide critical information, such as the specific services provided, the salary accrued but unpaid, or other information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. On November 11, 2020, the Debtors filed a *Notice of Correspondence Regarding the Ninety-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth Of Puerto Rico, Puerto Rico Highways And transportation Authority, And Employees Retirement System of The Government of the Commonwealth of Puerto Rico to Individual Proofs Of Claim Nos. 161340, 12995, 14790, and 53781* (the “Notice of Correspondence”) [ECF No. 15090].

4. Despite multiple efforts and due to technical difficulties with the CM/ECF system, the undersigned were unable to properly upload all corresponding exhibits to the Notice of Correspondence, which were timely ready to be filed. Accordingly, Debtors hereby submit Exhibits A, B, B-1, C, and C-1 to the Notice of Correspondence.

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: November 12, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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